

### **Remarks**

In the Office Action of December 11, 2006, the Examiner rejected claims 46 – 49 as obvious under §103(a) over Snyders US 5,982,996 in view of Heiney US 5,983,243.

### **Personal Interview**

Applicants express their thanks the Examiner and his supervisor for the personal interview on February 28, 2007, with the undersigned attorney as well as Edmund Mangold, patent counsel for the assignee company, Océ Printing Systems, GmbH. During the interview, the cited references of Snyders and Heiney were discussed and the invention was compared to the teachings of the references.

### **35 USC §103(a)**

The Snyders reference is not concerned with the content of the document that is being printed. There is no disclosure in Snyders of referencing variable and fixed data within a document.

By contrast, the present invention provides a method for printing in which the document includes static data and auxiliary data. Such variable and fixed data are transmitted as documents that are logically linked by referencing (see the specification at page 3, lines 17 and 18; page 5, lines 23 and 24). The present invention provides a user input for controlling the referencing (see the specification page 4, lines 10 and 11).

The Examiner acknowledges that Snyders does not show controlling the referencing of auxiliary information in a master document, *cf.* P. 11.

The Examiner cited Heiney as showing these features in Figures 2 and 3, at col. 4, lines 19 67, and col. 5, lines 37 – 49 and 57 – 65.

Applicants submit that these features are not shown in the cited portions of Heiney, nor elsewhere in the document.

### **User Input**

Applicants submit that the Heiney reference teaches away from user input to control the referencing of auxiliary information in a master document. Heiney seeks to avoid user input, see col. 1, lines 13 – 17; col. 2, lines 22 – 35; col. 2, lines 44 – 49. The Heiney reference automatically generates the document. Col. 2, lines 32 – 33.

The claimed invention of claim 46 provides that the user input is used to control the referencing of the auxiliary information in the master document. Since Snyders does not address the auxiliary and master document information and since Heiney seeks to avoid user input in combining variable and fixed data, the combination of these references does not teach or suggest the claimed invention. The invention is therefore non-obvious over the combined teachings of the art.

#### Separate Transmittal

The Heiney reference prepares the variable and fixed information separately, rasterizes the images to full size and then merges them. The preferred embodiment outputs a single PDL file containing both the fixed and variable data, see col. 6, lines 8 – 13.

The claimed invention provides for transmitting the auxiliary information separately from the data of the master document. Joining of the master document and auxiliary information is provided in the printer.

#### Different Printer Technology

The Snyders reference relates to printing using a PC and desktop printer, providing so called low speed printing. The Heiney reference is directed to IBM AS400 scale printing for printing 400 pages per minute, see col. 1, lines 22 – 26.

The person of ordinary skill in the art at the time this invention was filed would consider the world of low speed desktop printing to be separate and distinct from the world of high speed printing and would not consider the teachings of references from these two distinct worlds to be combinable. As such, the Snyders and Heiney references would not be combined by the person of ordinary skill.

It is the present invention that provides the incentive to combine the aspects of printing on these two different scales into a single printing operation. The combination of what has heretofore been seen as separate itself constitutes invention.

## **Conclusion**

The present invention has been shown to be non-obvious over the combined teachings of the prior art. As such, favorable reconsideration and allowance of the present application is hereby requested.

Respectfully submitted,



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